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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LAURI VALJAKKA;

Plaintiff,

v.

NETFLIX, INC.,

Defendants.

Case No. 4:22-cv-01490-JST

**DECLARATION OF ERIC D.
MOREHOUSE**

JUDGE: HON. JON S. TIGAR
DATE: JANUARY 25, 2024
TIME: 2:00 P.M.
CRTRM: 6 – 2ND FLOOR

I, Eric D. Morehouse, declare as follows:

1. I am an adult, under no legal disability, and I have personal knowledge of the facts stated in this Declaration.

2. I am a co-founder of AiPi, LLC (“AiPi”).

3. AiPi is a Delaware corporation. AiPi’s headquarters and office where it does

1 business has been located in Virginia since I founded the company in 2016.

2 4. Since 2016, AiPi has leased office space at 11718 Bowman Green Drive,
3 Reston, VA 20190. This is currently AiPi's only office and the sole location where AiPi's
4 five employees work when not working from home. AiPi does not own, lease, operate, or
5 control any other office, distribution center, retail location, or other physical space aside
6 from its Virginia office.

7 5. AiPi employs 5 employees, all of which work from the office in Virginia. None
8 of AiPi's employees are located in California. None of AiPi's consultants work for AiPi
9 in California. AiPi has no connection to California and transacts no business in
10 California.

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6. AiPi does not conduct business in California, maintain any offices in California, nor have any employees conducting business in the state of California.

I declare under penalty of perjury that the foregoing is true and correct.



Eric D. Morehouse

11/21/2023

Date